COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

TOWN OF FRAMINGHAM REQUEST FOR DETERMINATION OF RATES APPLICABLE TO TRANSPORTATION AND TREATMENT OF SEWAGE PURSUANT TO INTERMUNICIPAL AGREEMENT	)	**D.T.E. 02-46**

TOWN OF FRAMINGHAM'S RESPONSE TO THE DEPARTMENT'S THIRD SET OF INFORMATION REQUESTS

The Town of Framingham ("Framingham") responds to the Department's Third Set of Information Requests as follows.

DTE F-3-1

At how many points downstream of Ashland's discharges into the Framingham sewerage system does Framingham sewage flow into shared facilities? Please identify these locations, using street names, intersections, and sewer line names or sizes as reference points.

RESPONSE

There are several locations at which Framingham sewage flows into the shared pipes downstream of the actual connection point of Ashland's pipes. The exact quantity cannot be determined as it includes both laterals servicing other Framingham streets and actual house connections to the sewer from properties serviced along the route traversed by the shared sewer.

A list of some of the connections identified by street and pipe size in inches is as follows:

Intersecting Street	Shared Pipe	Pipe Size (inches)
Bates Road	Beaver Dam Interceptor (BDI)	12
Hearth Street	BDI	12
Eames Street	BDI	14
Summit Street Extension	BDI	8
Herbert Street	BDI	14
Herbert Ave	BDI	6
Tripp Street	BDI	8
Loring Drive	BDI	14
Irving Street	BDI	8
Beaver Street	BDI	8
Beaver Street	BDI	10
Taralli Terrace	BDI	8
Waverley Street	BDI	18
Arthur Street	BDI	18

Bishop Street	Farm Pond Interceptor (FPI)	18
Waverley Street	FPI	10
Waverley Street	FPI	15
Farm Pond Interceptor	FPI	30

This list does not include any direct connections from dwellings along the route traversed by the shared sewer. Based upon visual observation, the private sewer service connections to the shared pipe likely exceed 200 in number.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-2

Please refer to proposed Exh. FR-11 (corrected Table 6.2 of SEA's Sewer Rate Assessment Study).

a. Please identify in greater detail the locations of the starting and ending points of the pipe segments by referring to nearby street intersections and/or tributary sewer lines.

b. Why did SEA choose these particular points to define the pipe segments?

c. Does the share in the second column represent Ashland's use percentage at the start of the segment, the end of the segment, or something else?

RESPONSE

a. Please see the attached figure, which has been marked as proposed Ex. FR-16. The figure identifies the size and material of each segment of pipe. The figure also identifies the 18-inch cast iron pipe that runs parallel to the BDI and the 24x36-inch brick sewer that runs along Waverley Street interconnecting the BDI and the FPI. Ashland's flows are transported intermittently through these pipes. Please note that some of the pipe sizes are different from those presented in Table 6.2. This is based upon recent information provided by the Town.

b. SEA chose these segments as they represented sections of the shared pipe where the pipe size was of a relatively constant size and influences from other connections were minor as compared to the total flow in the pipe at that location.

c. The percentage represents an estimate of percentage use by Ashland based upon SEA's knowledge of the collection system. The value listed indicates the approximate average percentage throughout the segment.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-3

Please compare proposed Exh. DTE-1 (Massachusetts Water Resources Authority Community Sewerage Map for the Town of Framingham (November 2001), provided by Framingham in response to the Hearing Officer's Memorandum of September 25, 2002) with Framingham's response to information request ASH 1-2. The map appears to indicate that the sewer that parallels the railroad tracks in the vicinity of Beaver Dam Brook is 18 inches in diameter, but then drops to 14 inches along Herbert Street. The response to ASH 1-2 indicates that the pipe along Herbert Street from Eames Street to Irving Street is 24 inches in diameter. Please clarify the diameter(s) of the sewer from Bates Road to the intersection of Herbert and Irving Streets.

RESPONSE

The pipe sizes are as depicted in the detail provided on Ex. FR-16. There are several changes in pipe diameters and configuration in the area specified in the question. These changes are a result of upgrades to the system over the time period.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-4

Please provide a schematic diagram that clearly identifies the various sewer lines (including street names and sewer diameters) that are obscured by the labels for the public connections to MWRA facilities in the vicinity of the Arthur Street Pump Station in proposed Exh. DTE-1. The diagram should make it clear which flows combine with flows from the 24″ Waverly Street and 42″ Morton Street interceptors prior to entering the pump station.

RESPONSE

The Arthur Street pump station is owned and operated by the MWRA. Framingham does not have record drawings of the station and those parts of the pipelines that lie on MWRA property. A schematic that approximates the pipe configuration is shown on Ex. FR-16.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-5

Please refer to Framingham's responses to information requests DTE F-1-7 and ASH 1-9.

a. Describe the nature of the "emergency overflow situations." What facilities or properties are affected? Approximately how often do such situations occur?

b. Please complete your response to ASH 1-9 regarding costs incurred by Framingham to respond to emergency overflows on Ashland-owned facilities.

RESPONSE

a. Robert Angelo, Framingham Water and Sewer Superintendent, reports that the department has periodically discovered overflows in sections of the Chestnut Road pump station force main (Farm Pond Interceptor connection). These occurrences, typically once per year on an annual basis, have happened during the late winter and early springtime in association with peak groundwater levels and significant precipitation events.

The overflows occur primarily within the area of the railway easement near the Farm Pond.

The Town does not have documentation pertaining to these events. Personnel working for the sewer department over the last thirty years, however, recollect that the overflows occur approximately once per year.

b. The Town does not track the costs to operate and maintain the collection system in this manner. It is estimated that the effort to respond to one yearly overflow is about $5,000. The Town has made no request to obtain repayment of these expenditures.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc., and Robert Angelo, Framingham Water and Sewer Superintendent.

DTE F-3-6

Does Framingham currently have plans to do repair work on any of the shared facilities? If so, what is the nature of the work to be performed, where is it to be performed, and what is the anticipated schedule for performing the work? Please explain whether these projects would be performed by Framingham employees or by contractors.

RESPONSE

SEA currently is preparing a comprehensive wastewater management plan for Framingham, which will identify and prioritize capital upgrades to the system to provide a long-term and sustainable wastewater collection system. This study will not be complete for approximately 3 years. The Town does not have any specific plans to do substantial repair work to any of the shared facilities until the study is completed. However, minor repairs and rehabilitation work will be required in order to maintain the existing level of service in the pipes.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-7

Please describe the types of routine maintenance tasks that Framingham performs on the shared facilities. For each type of task, explain whether the work is typically performed by Framingham staff or by contractors.

RESPONSE

The Town of Framingham carries out several routine maintenance tasks on the shared facilities. These tasks include:

- Inspection of Structures (typically manholes, etc.)
- Internal Pipe Inspection
- Cleaning of Pipes
- Cleaning of Structures
- Siphon Cleaning
- Chemical Addition
- Easement Maintenance

The Town has the equipment and staff necessary to provide ordinary levels of maintenance on its sewer system. However, the Town does utilize specialized contractors to assist in the maintenance of these pipes. This is due to the high level of service required for these facilities.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc., and Robert Angelo, Water and Sewer Superintendent.

DTE F-3-8

Please refer to Framingham's response to information request ASH 1-13. Where are the two siphons mentioned located?

RESPONSE

A pair of siphons is located at the intersection of Irving Street and Herbert Street. A third siphon is located approximately 500 feet to the northeast along the Beaver Dam Interceptor, where the pipe passes under a brook. The approximate locations of all three siphons are depicted on Ex. FR-16.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-9

Please refer to proposed Exh. FR-5 (Agreement between City of Brockton and Town of Abington).

a. At how many discrete points does Abington's sewage enter Brockton?

b. Please provide Brockton's formula for calculating the "Transport Fee," as described in the third amendment to the agreement. In addition, please detail the components of that calculation, describing the costs that are include or excluded and any assumptions made.

RESPONSE

a. The Town of Abington's sewage connects to the Town of Brockton's sewer system at a single location.

b. The formula for calculating the "Transport Fee" changes on an annual basis. The attached worksheet, marked as proposed Exhibit FR-17, reflects the formula used by Brockton to calculate the rate to be charged to Abington in 1999 for transport only. (Abington pays a separate bill for wastewater treatment and disposal). This rate is based upon the cost of operation and maintenance of the entire collection system, debt service and indirect costs. The resultant fee is a percentage of the rate set for all measured flows from Abington. In 1999, the resultant rate charge was $0.83 per hundred cubic feet. If Framingham were to charge Ashland at this rate, in 2001 Ashland would have paid $425,498 for transportation of its wastewater.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-10

Please refer to proposed Exh. FR-6, at 17 (Agreement between Town of Bellingham and Charles River Water Pollution Control District). In § 303 of the agreement, does the "net operating cost of the District" include both the treatment works and the collections system?

RESPONSE

Yes, the net operating cost of the District includes the cost of operating the collection system. See definitions section of the agreement, especially "Net Operating Cost" and "Sewage Works".

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-11

Please refer to proposed Exh. FR-7, at ¶ 7(g) (Agreement between Town of Rockland and Town of Abington). Please clarify whether the "costs of operation and maintenance of the plant" refer to both the treatment works and the collections system.

RESPONSE

Yes, the cost of operation and maintenance of the plant refers to both the treatment works and the collection system. See Sections 7.g(1) and (2). These sections specify fees based upon the sewer user charges, which include the costs of operation and maintenance of all facilities.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-12

Refer to Mr. Geribo's testimony at 16-17 and proposed Exh. FR-2, at 6-21 (SEA's May 2001 Sewer Rate Assessment Study).

a. Please provide a list or description of all of the costs that are included in the "Total Costs" component of the formula proposed to calculate Framingham's O&M Costs.

b. Do "Total Costs" include overhead costs incurred by Framingham? If not, why not? If so, please provide a list of such overhead costs and a justification for why they should be included in Ashland's sewer rate.

RESPONSE

a. The major categories are as follows:

Salaries and wages
Education and Training
Uniform Service
Social Security, Medicare, Pension
Fuels and gas
Electricity
Building and Ground Maintenance
Patching and Main repairs
Engineering Services and Consultants
Printing
Telecommunications
Postage
Police Details
Vehicle Maintenance and Fuel
Materials
Housekeeping Materials and Supplies
Tools
Replacement Equipment
Indirect Costs

b. Yes. Indirect or "overhead" costs include:

Salaries and wages for personnel from other departments providing support to the Sewer Division, including engineering, purchasing, legal, administrative, publics works, and payroll personnel;
Insurance Costs;
Other Benefits Costs.

These costs are justified, as they are costs associated with the Town's operation and maintenance of the wastewater collection system. The other departments in the Town support the day-to-day operation of the wastewater collection system. All users of the collection system pay these costs. If the wastewater division were operated as an independent entity, these services would be required to properly and completely fulfill the obligations of the Town to maintain a sewage transport and disposal service.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-13

Refer to Mr. Geribo's testimony at 31 and proposed Exh. FR-2, at 6-22

a. Please explain what is meant by "Actual Construction Costs" in the equation found under item 3 of proposed Exh. FR-2, at 6-22.

b. Does Framingham have the ability to track the costs of construction projects that have occurred specifically on the sewer facilities shared by Framingham and Ashland in a given year? If not, how would Framingham calculate the "Actual Construction Costs" in a given year?

RESPONSE

a. Actual construction costs include the costs of planning, engineering design, bidding, permitting, administration, resident services, general construction, and debt service for any portion of the shared system that is replaced or upgraded. Any grants received for the project would be deducted from the actual construction costs.

b. The Town does have the ability to track these construction costs in a given year.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-14

Refer to Mr. Geribo's testimony at 17 and proposed Exh. FR-4 (Framingham response to Department's first set of information requests, Tab G). The total Framingham sewer budget referenced in proposed Exh. FR-4 indicates that it is inclusive of "indirect costs." Please provide a list of these "indirect costs." For each indirect cost, explain why it should be included in the calculation of Ashland's rate.

RESPONSE

See response to DTE F-3-12(b).

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-15

Refer to Mr. Addelson's testimony at 5. Is the threshold of $25,000 and a useful life of 5 or more years the distinction between a capita project and an O&M cost? If not, what standard does Framingham use to differentiate between a capital project and an O&M cost?

RESPONSE

Yes. This response was provided by Robert Addelson.

DTE F-3-16

Refer to Mr. Addelson's testimony at 5. Please provide the capital and O&M budgets approved at the Framingham town meetings for the last five years. Also provide the actual reconciled amount for the capital and O&M budgets for the last five years.

RESPONSE

See proposed Exhibit FR-18, consisting of schedules showing budgeted and actual sewer expenditures for fiscal years 1999, 2000, 2001, and 2002, and the approved submissions for operating and capital expenditures for fiscal year 2003. On the schedules, operating expenses (budgeted and expended) are broken down into four categories – personal services, operations, MWRA assessments, and indirect costs. Capital allocations (budgeted and expended) are identified by article number and the year the project was approved. Thus, for example, "ATM97 A41 Sewer Imp" refers to Article 41, approved at the 1997 annual town meeting, relating to sewer improvements.

This response was provided by Robert Addelson.

DTE F-3-17

Please describe how Framingham tracks sewer system maintenance tasks and their costs.

a. Does Framingham use a work order system to track sewer system maintenance tasks?

b. If so, is the system computerized? If the system is not currently computerized, does the Town anticipate obtaining a computer-based work order system, and if so, when?

c. If the Town does not use a work order system, how does it track the locations and costs of sewer maintenance tasks or projects?

RESPONSE

a. The Town of Framingham does not track sewer system maintenance using a work order system. The objective of the department is to maintain the sewer system service at an optimum level without developing excessive costs to the system users. This is done utilizing standard operating procedures, best management practices, and reactive response to maintain wastewater facilities.

b. There is no computerized system currently in place. The Town is currently exploring the possibility of implementing a work order system to provide better tracking of operation and maintenance costs for the collection system. The timing of the implementation system has not been determined at this time.

c. Because the costs of operating and maintaining the collection system are spread evenly throughout the entire user base, the Town has no need to track operation and maintenance on

a task basis. Currently, locations of emergency operation and maintenance work are documented in a logbook.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

DTE F-3-18

Refer to Mr. Geribo's testimony at 16, line 16. Please provide detailed costs accounting for the $2,317,000 figure referenced here. Provide this information by project number, location and work order, if available. Also, please indicate what portion of these costs is indirect costs and provide a detailed breakdown of these indirect costs.

RESPONSE

See response to DTE F-3-12(a), and proposed Ex. FR-18, which identify the categories of costs included in the O&M budget in any one year. Framingham notes that the $2,317,000 figure referenced in SEA's report was only an estimated O&M number for 2001. Framingham does not track its O&M costs by project number, location, or work order.

This response was provided by Paul Brinkman and Stephen Geribo of SEA Consultants, Inc.

Respectfully submitted,
THE TOWN OF FRAMINGHAM,
By its attorneys,

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Christopher J. Petrini
Erin K. Higgins
Conn Kavanaugh Rosenthal Peisch
& Ford, LLP
Ten Post Office Square
Boston MA 02019
(617) 482-8200
(617) 482-6444 (fax)

DATED:_____

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